

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE:) BK. NO. 10-81721
) (Chapter 13)
)
BARBARA A. VICKERS,)
)
)
Debtor.)

**THE ROXBURY, L.L.C.'S AND FUGLY'S L.L.C.'S
OBJECTION TO CONFIRMATION OF PLAN**

COMES NOW The Roxbury, L.L.C., a Nebraska limited liability company ("Roxbury") and Fugly's L.L.C., a Nebraska limited liability company ("Fugly's"), secured creditors herein and object to confirmation of the Debtor's Chapter 13 Plan ("Plan") for the following reasons:

1. Roxbury and Fugly's are secured creditors herein pursuant to a Security Agreement dated June 26, 2009, which granted Roxbury and Fugly's a special property interest in certain bar inventory and equipment.
2. The Plan fails to comply with the requirements of 11 U.S.C. §1325(a)(3) and/or 11 U.S.C. §1325(a)(6), in that the Plan has not been proposed in good faith and/or the Debtor will be unable to make all payments under the Plan and to comply with the Plan due to the fact that the Plan relies heavily on income that is projected from events that have yet to occur or that may never occur (sublease of nightclub) for the following reasons: (a) Debtor's lease of the nightclub premises was previously terminated due to non-payment of rent; (b) the Debtor has failed to identify a sub-lessee with the financial ability to sublease the nightclub; and (c) any sublease of the nightclub will be contingent on sub-lessee's ability to obtain a liquor license.

3. For the above-reasons, the Plan is also not feasible.

WHEREFORE, Roxbury and Fugly's pray that their objection to confirmation of the Plan be sustained and for such other and further relief as is just and equitable.

Dated this 24th day of August, 2010.

THE ROXBURY, L.L.C., a Nebraska limited liability company, and FUGLY'S, L.L.C., a Nebraska limited liability company, Creditors

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of August, 2010, I caused the filing and electronic service of this Objection to Confirmation of Plan with the Clerk of the Bankruptcy Court using the CM/ECF system of the United States Bankruptcy Court for the District of Nebraska.

Nadine Ostrow